

AS:JMK:DGR F. #2016R00467

U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

November 7, 2018

By Hand and ECF

The Honorable Margo K. Brodie United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Tim Leissner

Criminal Docket No. 18-439 (MKB)

Dear Judge Brodie:

The government respectfully submits this letter in response to the letter motion filed by counsel for The New York Times Company on November 5, 2018, seeking to unseal the transcript of the August 28, 2018 guilty plea entered by the defendant Tim Leissner in the above-captioned matter. For the reasons set forth in a separate submission filed today under seal, the government consents to the unsealing of a redacted version of the transcript of the

defendant's guilty plea. The government has conferred with counsel for the defendant and they join in this request.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/

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/s/

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/s/

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cc: Robert O'Neill, Esq. (Counsel to the defendant) (by e-mail)
Al-Amyn Sumar, Esq. (Counsel to The New York Times Company) (by e-mail)
David McCraw, Esq. (Counsel to The New York Times Company) (by e-mail)